

EXHIBIT B

FROM: EMAIL ADDRESS

To: EMAIL ADDRESS

RE: COURT ORDER NOTICE OF CLASS ACTION

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If your child has or had a supervised Google Account for which either the Google “Web & App Activity” control or the “Supplemental Web & App Activity” sub-setting was turned off or “paused,” your child could be included in an ongoing class action lawsuit.

Para una notificación en Español, visitar www.XXXXXXXXXX.com.

A federal Court authorized this Notice. This is not a solicitation from a lawyer.

What is the lawsuit about? Four Google account holders (“Plaintiffs”) filed a class action lawsuit alleging that Google LLC (“Google”) unlawfully accessed their devices and data, including app activity data on their mobile devices, even though the Google activity controls called Web & App Activity (“WAA”) and/or a sub-setting concerning “Chrome history and activity from sites, apps, and devices that use Google services,” sometimes called supplemental Web & App Activity (“sWAA”) were turned off or “paused.” Plaintiffs allege Google unlawfully accessed their mobile devices to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps. Plaintiffs have three legal claims: 1) invasion of privacy; 2) intrusion upon seclusion (similar to invasion of privacy); and 3) violation of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”). For all three legal claims Plaintiffs seek money damages and changes to Google’s practices.

Google denies Plaintiffs’ legal claims and does not admit any wrongdoing. The Court has not decided who is right.

You are receiving this Notice because Google’s records indicate that your child has or had a supervised Google Account and may be a Class Member. A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is supervised by a parent using Google Family Link.

The Court decided the legal claims brought by Plaintiffs can proceed as a nationwide class action. Your child may be included as a Class Member if their supervised Google Account has or had WAA and/or sWAA turned off or “paused” at any time between July 1, 2016 and [NOTICE DATE TK]. This Notice only advises you of the existence of this lawsuit, your child’s rights and options, and the deadlines to exercise them, if they are a Class Member. More specifically, the Court certified the following classes.

Comprehensive Computer Data Access and Fraud Act (“CDAFA”)

For the alleged violation of the CDAFA, the Court certified the following classes:

Class 1: All individuals who, during the period beginning July 1, 2016 and continuing through [NOTICE DATE TK], (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

Class 2: All individuals who, during the period beginning July 1, 2016 and continuing through [NOTICE DATE TK], (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b)

whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

Invasion of Privacy and Intrusion upon Seclusion

For the alleged invasion of privacy and intrusion upon seclusion legal claims, the Court certified the same Class 1 and Class 2 but excluded individuals who only have an “Enterprise” account or “supervised Google Account for users under age 13” (also known as a “Unicorn” account). An “Enterprise” account is an account managed by an administrator that is designed for use by end users within an organization, such as businesses, non-profits, and schools. A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is supervised by a parent using Google Family Link. If your child’s supervised Google Account was created when they were under the age of 13 and the child is now 13 or older, including being over the age of 18, they may still be a Class Member.

Class 1: All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing [NOTICE DATE TK], (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

Class 2: All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing through [NOTICE DATE TK], (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

If you are a parent or guardian supervising a Google Account for your child and if Google’s records indicate that you may be a Class Member in your own right, you will receive a separate Notice.

Is there any money or benefits available now? No money or benefits are available now. The Court has not decided whether Google did anything wrong, and Plaintiffs and Google have not settled the lawsuit. There is no guarantee money or benefits will be obtained in the future. You will be notified if money or benefits become available.

What happens if I do nothing at all? If you do nothing, your child will remain a Class Member. If Plaintiffs obtain money or benefits from this lawsuit—as a result of a trial or a settlement—your child may receive a payment or benefits in the future. If you do nothing now, regardless of whether Plaintiffs win or lose, your child will be legally bound by all Court orders and judgments regarding the legal claims in this lawsuit. You will lose the right to bring or maintain a separate lawsuit against Google for the legal claims alleged in this lawsuit on behalf of your child.

How do I exclude my child? To exclude your child, you must send a written request by mail stating that you want them to be excluded from *Rodriguez v. Google LLC*. You must include the name of your child, and the address, telephone number, email address associated with your child’s supervised Google Account, and your name, telephone number, email address, and signature. You must mail this exclusion request **postmarked by Month DD, 20YY**, to: Rodriguez v. Google Exclusions, P.O. Box xxxx, Portland, OR 97xxx-xxxx.

You cannot exclude your child on the phone or by email. To exclude your child, you must do so individually and separately; no consolidated, group, or mass requests for exclusion will be accepted. That means you cannot consolidate your written request to be excluded with your child’s request if you are also a Class Member. If you timely ask for your child to be excluded, your child will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) Google on behalf of your child in the future regarding the legal claims in this lawsuit. If you do not exclude your child, by **Month DD, 2024**, they will remain a Class Member and be bound by the orders of the Court in this lawsuit.

Do I have a lawyer in this case? Yes. The Court has appointed the following lawyers as Class Counsel to represent Class Members. If you have questions, you can reach Class Counsel by sending an email to: ClassCounsel@domain.com. You may also hire your own lawyer at your own expense who may appear on your behalf.

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

John A. Yanchunis
Ryan J. McGee
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602

Bill Carmody
SUSMAN GODFREY LLP
One Manhattan West, 50th Floor
New York, NY 10001

James Lee
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131

Amanda Bonn
SUSMAN GODFREY LLP
1900 Ave. of the Stars, Suite 1400
Los Angeles, California 90067

How do I get more information? This Notice is a summary. Learn more about the lawsuit at www.xxxxxxxxxx.com or call 1-xxx-xxx-xxxx.

You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS LAWSUIT. ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.